

**IN THE UNITED STATES DISTRICT COURT
FOR THE WESTERN DISTRICT OF VIRGINIA
ROANOKE DIVISION**

DANIEL NOTESTEIN, BLOCKTRADES
INTERNATIONAL, LTD., ANDREW
CHANEY, SZYMON LAPINSKI, ADAM
DODSON, ELMER LIN, DANIEL HENSLEY,
MICHAEL WOLF, MATHIEU GAGNON, and
MARTIN LEES,

Plaintiffs/Counter-
Defendants,

v.

Civil Action No. 7:20CV00342

BITTREX, INC.,

Defendant/Counter-
Plaintiff

J. DOES, and

Defendants

STEEMIT, INC.

Third-Party
Defendant

**DECLARATION OF CLAIRE MARTIROSIAN IN SUPPORT OF
BITTREX, INC.'S MOTION TO DEPOSIT DISPUTED CRYPTOCURRENCY INTO
THE COURT REGISTRY**

I, Claire Martirosian, pursuant to 28 U.S.C. § 1746, declare under penalty of perjury as follows:

1. I am one of the attorneys for Defendant Bittrex, Inc. (“Bittrex”) in the above-captioned matter and am competent to testify to the matters set forth herein. I submit this declaration in support of Bittrex’s Motion to Deposit Disputed Cryptocurrency into the Court Registry.

2. On or about July 13, 2020, I had a telephone conversation with Michael Dicke of Fenwick & West LLP, who I currently understand to be counsel for Third-Party Defendant Steemit, Inc. and other unidentified parties related to Steemit and/or Steemit, Inc. Mr. Dicke told me that his clients’ position was that Bittrex should not release the Steem and Steem-Backed

Dollars claimed by Plaintiffs/Counter-Defendants (the “Disputed Steem”) to Plaintiffs/Counter-Defendants. Mr. Dicke informed me that his clients took the position that (1) the Disputed Steem was stolen by the purported “white knight hacker,” and (2) Plaintiffs/Counter-Defendants were potentially involved in and/or connected to the actions of the purported “white knight hacker.”

I declare under penalty of perjury under the laws of the United States of America that the foregoing is true and correct.

DATED this 4th day of August, 2020 at Seattle, Washington.

By: s/Claire Martirosian
Claire Martirosian, WSBA No. 49528